Case 1:22-cv-05428-GHW Document 20 Filed 11/23/22

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ELECTRONICALLY FILED

MEMORANDUM ENDORSED

November 23, 2022

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VIA ECF

The Honorable Gregory Woods United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: Velazguez v. iHeartRaves, LLC, Case No. 1:22-cv-05428-GHW

Dear Judge Woods:

We represent Defendant iHeartRaves, LLC ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from November 23, 2022 to January 9, 2022.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, voluntary dismissal will be filed.

Respectfully submitted,

/s/ Karla Del Pozo García Karla Del Pozo García

All counsel of record (by ECF) CC:

Application denied without prejudice. It is unclear from this letter whether the parties have agreed upon terms to settle this case and are asking for a stay to finalize the implementation of that settlement, or if, instead, the parties have not yet agreed upon the terms of a settlement and wish to adjourn the deadlines in the case to permit them to discuss the prospect of settlement. The Court does not construe the phrase used here--"finalize their efforts to bring about the voluntary dismissal of all claims . . . ," which focuses on ongoing "efforts"--to be the equivalent of "finalize their settlement." While a representation that a stay or conditional dismissal of this case would permit the parties to finalize a settlement would likely be a sufficient basis for the Court to stay or conditionally discontinue this case, the Court does not expect that on its own a request for time to discuss settlement would be. Any renewed application should provide additional information to permit the Court to evaluate the basis for the request.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 19.

SO ORDERED.

Date: November 23, 2022

GREGORY, H. WOODS United States District Judge

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